

**Wittels
McInturff
Palikovic**

Via ECF

The Honorable Edgardo Ramos
United States District Court
40 Foley Square, Courtroom 619
New York, NY 10007

Re: Brous, et al. v. Eligo Energy, LLC, et al., No. 1:24-cv-1260 (ER)

Dear Judge Ramos,

We write on behalf of Plaintiffs and the proposed Class in accordance with Your Honor's Individual Rule § 3.ii to provisionally redact portions of Plaintiffs' response, *see* ECF No. 211, to Defendants' pre-motion letter seeking a protective order with respect to the depositions of Mark Friedgan and Alex Goldstein, *see* ECF No. 208.

Plaintiffs' response contains information that Defendants have designated confidential under the court-ordered protective order (ECF No. 38). Per the Southern District of New York Electronic Case Filing Rules & Instructions § 6.5(a), Plaintiffs respectfully submit that the Viewing Level to be applied to the unredacted copy of this document filed contemporaneously with this letter should be "Selected Parties"—that is, limited to counsel appearing for Eligo and Plaintiffs.

The parties require additional time to formulate their positions on whether the enclosed information should remain under seal. Absent a briefing schedule set by the Court, Plaintiffs anticipate that by next week the parties will provide the Court with their positions on whether any or all of this information should remain under seal.

Thank you for the Court's consideration of this matter.

Dated: May 13, 2025

Respectfully submitted,

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